

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SCOTT GANGLOFF,

Plaintiff,

V.

SEARS ROEBUCK & CO., and
VAUGHAN & BUSHNELL MANUFACTURING CO.

Defendants,

Civil Action No. 02-CV-4615

Hon. Eduardo C. Robreno

PLAINTIFF'S PROPOSED JURY VERDICT SHEET

1. State whether you find that the Craftsman Model 38094 hammer was defective (i.e., whether there was an inadequate or insufficient warning system, whether the hammer contained any condition which made it unsafe for use, or lacked any element necessary to make it safe for use)?

Yes _____ No _____

[If you have answered "yes", continue to question 2. If you have answered "no", please return to the courtroom; your verdict is for the defendant.]

2. State whether any defective condition of the Craftsman Model 38094 hammer was a factual cause in bringing about injury to the plaintiff.

Yes No

[If you have answered “yes”, continue to question 3. If you have answered “no”, please return to the courtroom; your verdict is for the defendant.]

3. State the percentage of causal responsibility attributed to each party who manufactured, distributed, designed and/or sold the Craftsman Model 38094 hammer. Your answer must total 100%.

| | |
|--------------------------------------|---------|
| Vaughan & Bushnell Manufacturing Co. | _____ % |
| Sears, Roebuck & Co. | _____ % |
| TOTAL | _____ % |

[Proceed to Question #4.]

4. What sum of money will fairly and reasonably compensate Plaintiff, Scott Gangloff, for damages and injuries that he suffered as a result of the defective Craftsman Model 38094 hammer?

A. Past and Future Pain, Suffering, Disability, Humiliation, Embarrassment, Impairment, and Loss of Enjoyment of Life? \$ _____

B. Past and Future Medical Expenses? \$ _____

DAMAGES: \$ _____

JURY FOREPERSON
